

### REMARKS

In the Office Action dated June 22, 2005, claims 1-3, 6, 15-17, 20, 28, 29, and 37-39 were rejected under 35 U.S.C. § 102 over U.S. Patent No. 3,298,716 (Taylor); claims 8-13, 21-26, 30-35, and 40-45 were rejected under § 103 over Taylor in view of U.S. Patent No. 6,861,131 (Evans); and claims 8, 9, 14, 21, 22, 27, 30, 31, 36, 40, 41, and 46 were rejected under § 103 over Taylor in view of U.S. Patent No. 6,384,128 (Wadahara).

Amended claim 1 is distinguishable over Taylor. Taylor does not disclose an apparatus comprising a *cable* having an outer surface, and a seal assembly that comprises a thermoplastic seal and a preload member adapted to apply a force to and induce cold flow of the thermoplastic seal to seal against the outer surface of the cable.

Taylor teaches sealing at a coupling 6 between two pipes 1 and 2 (see Figs. 1 and 2 of Taylor). There is no teaching in Taylor of sealing against an outer surface of a cable. Therefore, claim 1 is not anticipated by Taylor.

Amended independent claim 38 is similarly allowable over Taylor.

Amended independent claim 15 is not disclosed by Taylor because the structure depicted in Taylor does not include inducing cold flow deformation of a component of a seal to create a fluidic seal against an outer surface of a control line that comprises at least one of a hydraulic line, fiber optic line, and electrical line.

With respect to amended independent claim 28, Taylor fails to disclose an apparatus having a control line having an outer surface where the control line comprises at least one of a fiber optic line and electrical line, and a seal having a ferrule and an adjacent seal member deformed by cold flow about at least a portion of the ferrule to seal against the outer surface of the control line.

Dependent claims are allowable for at least the same reasons as corresponding independent claims. In view of the amendments to the independent claims to overcome the teachings of Taylor, it is respectfully submitted that the § 103 rejections of dependent claims over Taylor and other references have been overcome.

In view of the allowability of generic claims 1 and 15, it is respectfully submitted that withdrawn dependent claims 4, 5, 7, 18, and 19 (which have been amended) be rejoined into the present application.

Allowance of all pending claims is respectfully requested. The Commissioner is authorized to charge any additional fees and/or credit any overpayment to Deposit Account No. 20-1504 (SHL.0272US).

Respectfully submitted,

Date: \_\_\_\_\_

*Jan 11, 2006*



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